

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MISSOURI**

THE STATE OF MISSOURI, ex rel.  
ANDREW BAILEY, in his official  
capacity as Missouri Attorney General,

Plaintiff,

V.

UNITED STATES DEPARTMENT OF  
HOMELAND SECURITY,

Defendant.

Case No. 4:24-cv-1050

## JOINT STATUS REPORT

Plaintiff and Defendant respectfully submit this joint status report, pursuant to the Court's October 11, 2024 Order, ECF No. 15. The parties state as follows:

1. This matter arises from Freedom of Information Act (FOIA) requests submitted by Plaintiff to Defendant, dated June 15, 2022 and March 7, 2024. The requests relate to domestic transportation of non-citizens by air into Missouri by Defendant. Upon conferral, the parties agreed that the March 7, 2024 request supersedes the June 15, 2022 request, such that Defendant may satisfy its FOIA obligations in this case by producing a lawful final response to the March 7, 2024 request.
2. The March 7, 2024 request was referred to two components within the U.S. Department of Homeland Security: U.S. Immigration & Customs Enforcement (ICE) and U.S. Customs and Border Protection (CBP).
3. CBP completed its processing of the request and produced a final response to Plaintiff on October 11, 2024. CBP did not locate any records responsive to the request.

4. As set out in the parties' March 10, 2025 JSR, the parties conferred on the scope and parameters of the March 7, 2024 request and reached agreement on a construal of that request. Pursuant to that construal, ICE has completed a search for responsive records and is processing those records to enable a final response.
5. In accordance with the Court's October 11, 2024 Order, the parties plan to file another joint status report on or by July 8, 2025.

Dated: May 9, 2025

Respectfully submitted,

ANDREW BAILEY  
Missouri Attorney General

/s/ Todd A. Scott  
Todd A. Scott, MO Bar #56614  
Senior Counsel

/s/ Andrew J. Crane  
Andrew J. Crane, MO Bar #68017  
Assistant Attorney General  
Missouri Attorney General's Office  
P.O. Box 899  
Jefferson City, MO 65102  
Tel: (573) 751-8366  
Fax: (573) 751-0774  
E-mail: Todd.Scott@ago.mo.gov

*Counsel for Plaintiff*

YAAKOV M. ROTH  
Acting Assistant Attorney General  
Civil Division

ELIZABETH J. SHAPIRO  
Deputy Director  
Federal Programs Branch

/s/ Christian S. Daniel  
Christian S. Daniel, Bar No. 1600226 (DC)  
Trial Attorney  
United States Department of Justice  
Civil Division, Federal Programs Branch  
1100 L Street, N.W., Rm. 12304  
Washington, D.C. 20005  
Tel: (202) 514-5838  
Email: christian.s.daniel@usdoj.gov

*Counsel for Defendant*